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August 30, 2011

Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Dear Chairman Genachowski:

RE: AT&T – T-Mobile Merger (WT Docket 11-65): Issue of 2G Subscriber Transitioning

On May 27, 2011, the National Coalition for Black Civic Participation (NCBCP) endorsed the AT&T-T-Mobile merger. Our letter of endorsement, joined in by eleven other national organizations, stated that “by approving the transaction, the Commission has an opportunity to make a positive economic impact in the lives of the nation’s 40 million African Americans and of generations to come as well as help the federal government to meet its goal to deploy the next generation of high-speed wireless coverage to 98% of all Americans.”

Today I write to address a new argument advanced by some merger opponents, who theorize that AT&T could rapidly provide nearly universal 4G wireless coverage without T-Mobile’s spectrum by rapidly shutting down 2G service and migrating 2G spectrum – and subscribers – to 4G.

Forcing AT&T’s 2G subscribers to shift immediately to 3G and 4G would pose undue financial hardship on those who need broadband the most. A demographic snapshot of those who still depend on 2G networks shows that these individuals are disproportionately elderly, disabled, low income, and minority customers – the underserved on the other side of the digital divide.

To push these 2G customers onto 3G or 4G platforms, AT&T would have to sell them new devices - a costly out of pocket expense. Elderly, minority, and low-income consumers are more likely to hold onto their existing cell phones until they reach the end of their usable life. Elderly consumers are very often on fixed incomes, and given this tumultuous economy, they can ill afford to add another expense on short notice.

Short-term expenses are especially difficult for most African Americans to bear. Compared to White Americans, African Americans are paid 20% lower wages, are twice as likely to be unemployed, and face a stunning 20:1 wealth gap. African Americans are still climbing out of the

2007-2010 recession, and they can ill afford to be forced to bear new telecommunications expenses on short notice.

We recognize that spectrum is limited and efficiency is a necessary component to managing networks in digital age. However, we believe a gradual process is more appropriate to ensure that those still using 2G devices will be able to still access their networks. Toward that end, AT&T has already taken significant steps to ensure that 2G traffic migrates to 3G or 4G within a reasonable time frame. AT&T no longer sells or allows its re-sellers or pre-paid vendors to sell devices which use the 2G platform,. And AT&T has offered significant additional spectrum incentives for customers to voluntarily switch to more efficient platforms.

Since mandatory and hasty 2G customer migration would disproportionately hurt low and fixed income consumers, we believe it is not the right solution to the spectrum crunch. Instead, the Commission should move forward with spectrum incentive auctions as soon as Congress authorizes them, continue to work closely with NTIA and DOD to identify government spectrum that can be repurposed, and allow the AT&T – T-Mobile merger to go forward while monitoring it carefully to ensure that the nearly universal 4G network is built out as contemplated in the merger application.

Sincerely,

A handwritten signature in black ink, reading "Melanie L. Campbell". The signature is fluid and cursive, with the first name "Melanie" being more prominent than the last name "Campbell".

Melanie L. Campbell  
President & CEO  
National Coalition for Black Civic Participation

cc: Hon. Michael Copps  
Hon. Robert McDowell  
Hon. Mignon Clyburn